

National Aeronautics and Space Administration

George C. Marshall Space Flight Center

Marshall Space Flight Center, AL 35812

January 22, 2013



Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees With Senior Institutional Responsibilities to Attend Madison Mayor Trulock's State of the City Address

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Certain NASA employees with senior institutional responsibilities have been invited to attend Madison Mayor Trulock's State of the City Address. This event is scheduled for Friday, January 25, 2013, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. There will be a cocktail party at 6:00 p.m., followed by dinner and the State of the City Address at 7:00 p.m.

This event will be a widely-attended gathering of local, state, and federal elected officials, Madison Chamber of Commerce members, community and business leaders, private industry, local media, and private citizens of Madison. The event is valued at \$95.00 per person and approximately 500 people are expected to attend. This event is sponsored by the Madison Chamber of Commerce and several of its local small business members which are not prohibited sources. Intergraph is the only sponsor which is a NASA prohibited source, and it is one of many sponsors. Any NASA employee who has duties affecting Intergraph should seek a separate opinion from the Office of Chief Counsel.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

I have determined that attendance of these senior institutional employees at the Madison State of the City Address is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state and local business and governmental leaders, enhance community relations, and support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these senior institutional employees attend this event outweighs any concern that free attendance

may or may appear to improperly influence them in the performance of their duties. Attendance of NASA employees with senior institutional responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations. Accordingly, NASA employees in the positions identified may accept free attendance at the event. Invited MSFC employees are MSFC Center Director, Deputy Director, and the Director and Deputy Director of the Office of Center Operations.

The Madison Chamber of Commerce and Intergraph are not lobbying organizations and are not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in blue ink, appearing to read "Audrey D. Robinson", with a long horizontal flourish extending to the right.

Audrey D. Robinson
Chief Counsel